

1 Patrick N. Keegan, Esq. (SBN 167698)  
2 pkeegan@keeganbaker.com  
3 KEEGAN & BAKER, LLP  
4 2292 Faraday Avenue, Suite 100  
5 Carlsbad, CA 92008  
6 Tel: (760) 929-9303  
7 Fax: (760) 929-9260  
8 Attorney for Plaintiff Tiffany Brinkley

9 William P. Cole, Esq. (SBN 186772)  
10 wcole@calljensen.com  
11 Matthew R. Orr, Esq. (SBN 211097)  
12 morr@calljensen.com  
13 CALL & JENSEN, APC  
14 610 Newport Center Drive, Suite 700  
15 Newport Beach, CA 92660  
16 Tel: (949) 717-3000  
17 Fax: (949) 717-3100  
18 Attorneys for Defendant Monterey Financial Services, LLC

19 **UNITED STATES DISTRICT COURT**

20 **SOUTHERN DISTRICT OF CALIFORNIA**

21 TIFFANY BRINKLEY, on behalf of  
22 herself and others similarly situated,

23 Plaintiff,

24 vs.

25 MONTEREY FINANCIAL SERVICES,  
26 LLC

27 Defendant.  
28

Case No. 3:16-cv-01103-WQH-WVG

**JOINT MOTION TO CONTINUE THE  
HEARING DATE AND BRIEFING  
SCHEDULE ON DEFENDANT  
MONTEREY FINANCIAL SERVICES,  
LLC'S MOTION TO DISMISS  
PLAINTIFF'S SECOND AMENDED  
COMPLAINT**

1 Plaintiff Tiffany Brinkley (“Plaintiff”), by and through her attorney, and  
 2 Monterey financial Services, LLC (“Defendant”), by and through its attorneys, files this  
 3 Joint Motion to continue by one week the hearing date and briefing schedule for  
 4 Defendant Monterey Financial LLC’s Motion to Dismiss Plaintiff’s Second Amended  
 5 Complaint (ECF No. 117). On December 20, 2018, Defendant filed said motion to  
 6 dismiss with a hearing date set for January 28, 2019. Due to a scheduling conflict,  
 7 Plaintiff’s counsel seeks a one week continuance of the hearing date and briefing  
 8 schedule for Defendant’s motion to dismiss, which Defendant does not oppose.

9 As a result, the parties jointly request that the hearing on Defendant Monterey  
 10 Financial LLC’s Motion to Dismiss Plaintiff’s Second Amended Complaint (ECF No.  
 11 117) be continued from January 28, 2019 to February 4, 2019, or a date thereafter that  
 12 is convenient to the Court, and that the Court issue an order adopting the following  
 13 briefing schedule on said motion:

- 14 1. Plaintiff’s opposition is due on January 21, 2019.
- 15 2. Defendant’s reply is due on January 28, 2019.

16 Dated: January 7, 2019

KEEGAN & BAKER, LLP

18 By: /s/ Patrick N. Keegan  
 19 Patrick N. Keegan, Esq.  
 Attorney for Plaintiff Tiffany Brinkley

21 Dated: January 7, 2019

CALL & JENSEN, APC

23 By: /s/ Matthew R. Orr  
 25 Matthew R. Orr  
 Attorney for Defendant Monterey Financial  
 Services, LLC

**SIGNATURE CERTIFICATION**

Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures Manual, I hereby certify that the content of this document is acceptable to Matthew R. Orr, counsel for Defendant Monterey Financial Services, LLC, and that I have obtained Mr. Orr's approval of this electronic signature to this document.

Dated: January 7, 2019

KEEGAN & BAKER, LLP

By: /s/ Patrick N. Keegan  
Patrick N. Keegan, Esq.  
Attorney for Plaintiff Tiffany Brinkley

**CERTIFICATE OF SERVICE**

I hereby certify that on January 7, 2019, I electronically filed the foregoing document described as **JOINT MOTION TO CONTINUE THE HEARING DATE AND BRIEFING SCHEDULE ON DEFENDANT MONTEREY FINANCIAL SERVICES, LLC'S MOTION TO DISMISS PLAINTIFF'S SECOND AMENDED COMPLAINT** with the Clerk of the Court using the CM/ECF System which will send notification of such filing via electronic mail to all counsel of record.

/s/ Patrick N. Keegan  
Patrick N. Keegan, Esq.